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*Interim Co-Lead Counsel for Plaintiff Class*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Master Docket No. 11-CV-2509-LHK

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO SEAL, PURSUANT TO  
CIVIL LOCAL RULE 79-5(d),  
PORTIONS OF PLAINTIFFS'  
MOTION TO COMPEL GOOGLE  
DOCUMENTS AND THE  
DECLARATION OF DEAN M.  
HARVEY IN SUPPORT THEREOF**

Pursuant to the Northern District of California Civil Local Rules 7-11 and 79-5(d),  
 Plaintiffs move to seal the following information:

- (i) Portions of Plaintiffs' Motion to Compel Production of Google Documents, specifically:
  - a. Page 2, line 1 through Page 2, line 20;
  - b. Page 2, footnote 1;
  - c. Page 4, line 23 through Page 3, line 24;
  - d. Page 4, line 26 through Page 3, line 28;
  - e. Page 5, line 2 through Page 6, line 5;
  - f. Page 6, portions of footnote 5.
- (ii) The following exhibits from the Declaration of Dean M. Harvey in Support of Plaintiffs' Motion to Compel Production of Google Documents: A-H, and J-M.

None of the information at issue was designated confidential by Plaintiffs. Instead, Defendants designated the above noted information as Confidential or Attorneys-Eyes Only under the Stipulated Protective Order (Modified by the Court), Dkt. No. 107. Therefore, the requirements under Local Rule 79-5(d) apply.

Pursuant to Local Rule 79-5(c), the proposed redacted versions of Plaintiffs' Motion to Compel Google Documents, and the Declaration of Dean M. Harvey in support thereof, have been attached as Exhibits A and B, respectively. Pursuant to this Court's January 11, 2013 Order (Dkt. 269), attached hereto as Exhibits C and D, lodged with the Court, are Plaintiffs' Motion to Compel Google Documents with the proposed redactions highlighted in yellow, and Declaration of Dean M. Harvey in support thereof, unredacted. Pursuant to Local Rule 79-5(c)(3) and (4), the present motion and all exhibits are being served and lodged with the Clerk in paper form.

Respectfully submitted,

Dated: January 16, 2013

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Dean M. Harvey  
Dean M. Harvey

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